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October 12, 2018

Honorable Sidney H. Stein, USDJ  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

Re: U.S. v. Ketabchi et al, Andrew Owimrin, defendant  
17 Cr. 243 (SHS)

Dear Judge Stein:

The defendant, Andrew Owimrin, again, is requesting a continuance of at least one week in order for us to review all of the recently received electronic material, which includes additional discovery, 3500 material, and exhibits made available to the defense on October 9, 10 and 11, 2018 (after receiving substantial discovery on October 1 and 4). I have attached screen shots of the folders received on those dates. The folders themselves, however, do not even reflect that many of the files contain not a few pages but tens or even hundreds of pages. For example, the discovery received on October 9 contain emails from three email addresses that included 599, 521 and 1269 emails, respectively. The government provided 383 exhibits on October 9 and 62 additional exhibits on October 10. As previously noted, we were given access to 25 calendars that when the electronic data is converted to PDF files produced approximately 3285 pages of documents on October 4, 2018.<sup>1</sup>

Even with the dump of so much material, the 3500 material does not include prior statements of witnesses such as William Sinclair, Michael Finocchiaro and Brooke

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<sup>1</sup> The government noted that our request for Google documents was not specific. The government is the party that had access to the principals (and staff) of Olive Branch Marketing and related companies who have been cooperating for more than a year.

Marcus that is in the government's possession that include emails, texts Skype and other means of communication.

Though your Honor has permitted me to retain the services of an associate attorney and recently, a paralegal, there is no way that the Owimrin defense team will be able to read and certainly not integrate all of the material before we start trial on Monday. There is much more that the defense team must do in addition to review relevant documents that are constantly flowing from the government.

Therefore, we respectfully request a continuance.

Respectfully submitted,

/s/

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Attorneys for Andrew Owimrin